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**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China  
 company; CHINA INTERNATIONAL  
 COMMUNICATIONS CO., LTD., a China  
 company; TVB HOLDINGS (USA), INC., a  
 California corporation; and DISH  
 NETWORK L.L.C., a Colorado corporation,  
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
 LIMITED, a Hong Kong company; HUA  
 YANG INTERNATIONAL TECHNOLOGY  
 LIMITED, a Hong Kong company;  
 SHENZHEN GREATVISION NETWORK  
 TECHNOLOGY CO. LTD., a China  
 company; CLUB TVPAD, INC., a California  
 corporation; BENNETT WONG, an  
 individual, ASHA MEDIA GROUP INC.  
 d/b/a TVPAD.COM, a Florida corporation;  
 AMIT BHALLA, an individual;  
 NEWTPAD LTD. COMPANY d/b/a  
 NEWTPAD.COM a/k/a TVPAD USA, a  
 Texas corporation; LIANGZHONG ZHOU,  
 an individual; HONGHUI CHEN d/b/a E-  
 DIGITAL, an individual; JOHN DOE 1 d/b/a  
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
 JOHN DOE 5 d/b/a GANG YUE; JOHN  
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
 d/b/a GANG TAI WU XIA; and JOHN DOES  
 8-10,

Defendants.

Case No.  
**CV 15-1869 SVW (AJWx)**

**STIPULATION FOR ENTRY  
 OF [PROPOSED] CONSENT  
 JUDGMENT AND  
 PERMANENT INJUNCTION  
 AS TO DEFENDANT  
 HONGHUI CHEN D/B/A E-  
 DIGITAL**

[Proposed Consent Judgment and  
 Permanent Injunction concurrently  
 submitted]

Courtroom: 6

Judge: Hon. Stephen V. Wilson

Action Filed: March 13, 2015

1 This Stipulation is entered by and between Plaintiffs China Central Television,  
 2 China International Communications Co., Ltd., TVB Holdings (USA), Inc. and DISH  
 3 Network L.L.C. (collectively, "Plaintiffs") and Defendant Honghui Chen d/b/a/ E-  
 4 Digital ("Defendant") through their respective counsel of record, with reference to  
 5 the following facts:

6 1. Plaintiffs filed the Complaint in this action on March 13, 2015, against,  
 7 among others, Defendant, with claims including: (1) secondary copyright  
 8 infringement under the copyright laws of the United States, 17 U.S.C. § 101 *et seq.*;  
 9 (2) federal trademark infringement and unfair competition under the Lanham Act, 15  
 10 U.S.C. § 1125(a); (3) common law trademark infringement and unfair competition;  
 11 and (4) violation of California Business and Professions Code § 17200, *et seq.*

12 2. Plaintiffs and Defendant have agreed to resolve their dispute, and have  
 13 entered into a Settlement Agreement wherein Defendant has agreed to entry of a  
 14 consent judgment and permanent injunctive relief in favor of Plaintiffs and in  
 15 accordance with other terms as set forth in the Settlement Agreement.

16 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**  
 17 **that:**

18 1. A true and correct copy of the Consent Judgment and Permanent Injunction  
 19 agreed to by the parties pursuant to this Stipulation and the parties' Settlement  
 20 Agreement (the "Consent Judgment") is attached hereto as **Exhibit 1**;

21 2. The parties agree that all facts set forth in the Consent Judgment are true and  
 22 accurate to their best knowledge and support entry of the Consent Judgment;

23 3. Defendant agrees to be bound by and abide by all permanent injunctive  
 24 relief set forth in the Consent Judgment entered by the Court;

25 4. The Parties hereby enter into this Stipulation with the advice of counsel  
 26 knowing its content and effect;

27 5. The Parties request that the Court enter the Consent Judgment in the  
 28 form attached as **Exhibit 1**; and

1 6. The Parties request the Court retain jurisdiction to enforce the Consent  
2 Judgment, once entered, as required.

3 So Stipulated.

4 DATED: February 8, 2016

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9 By: /s/Carla A. McCauley  
Carla A. McCauley

10 Attorneys for Plaintiffs  
11 CHINA CENTRAL TELEVISION; CHINA  
12 INTERNATIONAL COMMUNICATIONS  
13 CO., LTD.; TVB HOLDINGS (USA), INC.;  
AND DISH NETWORK L.L.C.

14 DATED: February 8, 2016

LT PACIFIC LAW GROUP LLP

16 By: /s/Jen-Feng Lee  
Jen-Feng Lee

18 Attorneys for Defendant  
19 HONGHUI CHEN d/b/a E-DIGITAL